UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

GEORGE GUINDON, ET ALS	:	
	:	
vs.	:	C.A. No. 03-335-L
	:	
AMERICAN FOAM CORPORATION, ET ALS	:	
	:	

DEFENDANT, MICHAEL DERDERIAN'S, ANSWER

Michael Derderian is presently charged in indictment K1 03-655A with two hundred counts of involuntary manslaughter as a result of the fire that occurred on February 20, 2003 at the Station Nightclub. Similar matters are included within the scope of the allegations of the First Amended Master Complaint and plaintiffs' Notice of Adoption. Under these circumstances, Michael Derderian expressly asserts his rights under the Fifth Amendment to the United States Constitution and Article 1, Section 13 of the Rhode Island Constitution ("Privilege") to the fullest extent possible in response to the First Amended Master Complaint and plaintiffs' Notice of Adoption and respectfully declines to answer the allegations contained in the First Amended Master Complaint and plaintiffs' Notice of Adoption for that reason.

The plaintiffs have adopted the first amended master complaint in *Albert L. Gray, Administrator, et al v. Jeffrey Derderian, et al*, C.A. No. 04-312L. The defendant, Michael Derderian, hereby incorporates by reference his answer filed on his behalf as his answer as if set forth fully herein.

The plaintiffs have also included the additional allegations set forth in the *Estate of Jude B. Henault, et als v. American Foam Corporation, et als*, C.A. No. 03-483-L "Notice of Adoption of First Amended Master Complaint." The defendant, Michael Derderian, hereby

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incorporates his answer filed on his behalf to said additional allegations as if set forth fully herein.

The defendant, Michael Derderian, is without sufficient information to admit or deny the allegations of paragraphs 260-280 of the notice of adoption but leaves the plaintiffs to their proof thereof.

MICHAEL DERDERIAN
By his attorney,

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THE DEFENDANT, MICHAEL DERDERIAN, HEREBY DEMANDS A TRIAL BY JURY.

Anthony F. DeMarco, Esquire #0799

CERTIFICATION

I hereby certify that on the 4th day of February, 2005, I e-mailed a copy of the within to the following attorneys of record:

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